

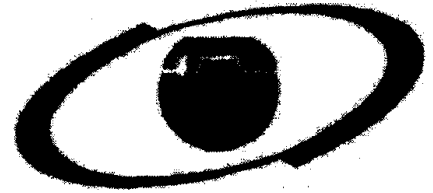
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**West Side Telecommunications**

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1449 Fairmont RD  
Morgantown WV 26501  
Office 304.983.2211  
Fax 304.983.9951

June 30, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation  
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

West Side Telephone Company ("West Side Telephone Company") submits this letter and accompanying certification as record that West Side Telephone Company is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")<sup>1</sup>, released on October 3, 2003, respecting the obligations of such Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), and replacing the Commission's interim compensation rules effective July 1, 2004.

As West Side Telephone Company is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, West Side Telephone Company is not subject to such requirements at this time. If West Side Telephone Company's operations are altered to the extent that West Side Telephone Company necessarily becomes a Completing Carrier, West Side Telephone Company intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

  
Name Michael Dawson  
Title General Manager  
West Side Telephone Company

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**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION  
OF *WEST SIDE TELEPHONE COMPANY***

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1. My name is *Michael Dawson*. I currently serve as the *Acting General Manager* of *West Side Telephone Company*, a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of *West Virginia*. In this capacity, I have become familiar with the network operations of *West Side Telephone Company* and its practices associated with the completion of calls originated from Pay Telephones.

2. West Side Telephone is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.

3. West Side's provision of operator services for the completion of local calls from pay telephones is handled by Verizon through a contractual arrangement.

4. West Side has confirmed with Verizon that any calls processed by Verizon are included in the respective call tracking systems and compensation remittance process of Verizon.

5. West Side Telephone Company does not currently provide a coinless access code service.

6. West Side Telephone does not currently provide a subscriber toll-free service.

7. West Side Telephone does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.

8. West Side does not create call detail records for either access code calls or subscriber toll-free payphone calls. West Side's action with respect to call detail records is limited to rating and billing.


9. West Side compensates Verizon for the wholesale cost of the call.

10. West Side has confirmed with Verizon that any calls purchased by West Side are included in the respective call tracking systems and compensation remittance process of Verizon.

11. In consideration of the aforementioned facts, West Side Telephone Company is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).

I certify under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct. Executed on *June 30, 2004*.

  
NAME *Michael Dawson*  
TITLE *General Manager*  
WEST SIDE TELEPHONE COMPANY  
1449 FAIRMONT RD  
MORGANTOWN, WV 26501